

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

MAXWELL KADEL, *et al.*,

Plaintiffs,

v.

DALE FOLWELL, in his official capacity as
State Treasurer of North Carolina, *et al.*,

Defendants.

Case No. 1:19-cv-00272-LCB-LPA

DECLARATION OF OMAR GONZALEZ-PAGAN

Pursuant to 28 U.S.C. § 1746, I, Omar Gonzalez-Pagan, do hereby declare as follows:

1. I am over 18 years of age.
2. I am Counsel at Lambda Legal Defense and Education Fund, Inc. and serve as counsel of record for the plaintiffs in the above-captioned matter.
3. I have personal knowledge of the stated herein, except those stated on information and belief, and if called upon, could and would testify competently to them.
4. I submit this declaration in support of Plaintiffs' Motion *in Limine* No. 3, regarding pronoun usage and misgendering.
5. Attached as **Exhibit 1** is a true and correct copy of the Letter Order entered in *Eller v. Prince George's Cnty. Pub. Sch.*, No. CV TDC-18-3649 (D. Md.), on October 18, 2019, as Docket Number 44.

6. Attached as **Exhibit 2** is a true and correct copy of Order issued by the U.S. Army Court of Criminal Appeals in *United States v. Manning*, No. ARMY 20130739, on March 14, 2015, and which was filed as Docket Number 113-4 in *Soule v. Connecticut Association of Schools*, No. 3:20-cv-00201-RNC (D. Conn.), on May 29, 2020.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated this 10th day of June, 2022.

/s/ Omar Gonzalez-Pagan
Omar Gonzalez-Pagan